

**Allocation and Apportionment of Income from  
Pass-Through Entities Issues List for MTC  
Income and Franchise Tax Uniformity Subcommittee**

1. Is business/nonbusiness income determined at the entity level or the owner level? Is the answer the same for all owners or are corporate owners treated differently? Does it make a difference if the entity and the owner are unitary?
2. Is apportionment and allocation determined at the entity level or the owner level? Is the answer the same for all owners or are corporate owners treated differently. Does it make a difference if the entity and the owner are unitary?
3. How are tiered pass-through entities treated? Are they collapsed?
4. Are the apportionment factors the same as for corporate entities?
5. Is there special treatment for specific industries as under the MTC allocation and apportionment regulations?
6. How are NOLs treated?